BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Wireless Telecommunications Bureau	)	WT Docket No. 02-46
Seeks Comment On Report On Technical	)	
And Operational Wireless E911 Issues	)	
	)	

COMMENTS OF
SPIRENT COMMUNICATIONS, INC.

Spirent Communications, Inc. ("Spirent") hereby submits comments in response to the Public Notice in the above-captioned proceeding.[1] Spirent is a leading supplier of testing, diagnosis and monitoring equipment and Operational Support Systems to the largest wireline and wireless providers in the United States. Among our many systems, Spirent supplies a widely deployed position location test system to verify the position determination accuracy and capability of E911 systems.

The Federal Communications Commission ("FCC" or "Commission") seeks comment on the final report, "*A Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services"* prepared for the FCC by Dale N. Hatfield and filed on October 15, 2002 ("Hatfield Report").

[1] Public Notice, DA 02-2666 (released October 16, 2002).

In the fall of 2001, the Commission announced that Dale N. Hatfield, former Chief of the Commission's Office of Engineering and Technology, would conduct an inquiry into technical and operational issues with wireless E911 deployment. The purpose of the inquiry was to obtain an expert, informed, unbiased assessment of the technical and operational issues that affect wireless E911 deployment. The FCC's Wireless Telecommunications Bureau ("WTB") stated that information would be gathered and evaluated from many sources, including from technology vendors, network equipment and handset manufacturers, carriers, the public safety community, and other sources concerning technology standards issues, development of hardware and software, and supply conditions. The WTB indicated that the focus of the inquiry was on the future of the wireless E911 deployment, including obstacles to deployment and steps that might be taken to overcome or minimize them.

On October 15, 2002, Mr. Hatfield filed a report conveying the results of his inquiry. Mr. Hatfield makes several findings about current E911 implementation efforts and offers a number of recommendations to address some of the principal issues and concerns raised during the course of the inquiry.

I. *Discussion*

No New Advisory Committee Is Needed

In his report, Mr. Hatfield recommends the establishment of an advisory committee to address the technical framework for the further development and evolution

of E911 systems and services including technical standards. Spirent believes that the establishment of such a committee is unnecessary since this work is already being conducted in established fora.

For example, the Alliance for Telecommunications Industry Solutions' Emergency Services Interconnection Forum ("ESIF") is actively engaged is such activities. The ESIF is an existing industry group that could pursue the creation of a functional, descriptive document to seek an end-to-end solution to the various technical issues encountered with E911 deployment.

ESIF's activities should include active participation by the various stakeholders in E911 deployments, including those entities that will have to bear the financial burden of deployment. The Commission should support such organizations through the participation of Commission staff and giving public recognition of the appropriateness of these functions.

In sum, since industry groups already exist and are capable of addressing the technical issues to the further development and evolution of E911 systems, no new advisory committee is necessary.

Testing and Certification of Wireless E911 Systems

The Hatfield Report recommends that the Commission urge stakeholders to develop industry-wide procedures for testing and certification of wireless E911 to ensure that they meet the accuracy requirements specified in the Commission's rules.

Spirent has observed in other communications marketplaces that standardized test methodologies promote the wide-spread deployment, and interoperability of new technology and communications systems. Spirent has also observed that both initial deployment testing, and ongoing in-service testing and monitoring are critical to ensuring the proper operation of both communications and control systems.

Need for End-to-End Testing

In his report, Mr. Hatfield raises the issues of end-to-end testing of the entire E911 system as deployed. End-to-end testing is a commonly used industry term for the testing and monitoring of a communications system as it is used or the service perceived by the actual end user. This approach encompasses the multiple technologies, multiple equipment vendors and multiple service providers involved.

Spirent has significant experience in the development and deployment of end-to-end, multi-vendor, multi-technology testing and monitoring systems for communications services and infrastructure, and finds this method to be the only way to ensure consistent and accurate performance of the system.

II. *Conclusion*

Spirent designs, develop and manufactures communications test, diagnostic and monitoring equipment and Operational Support Systems, for both wireline and wireless systems that are subject to, and affected by, the Commission's regulatory oversight. Spirent therefore has a direct and substantial interest in the wireless E911 deployment activities of the Commission and, more specifically, in the outcome of the issues addressed in the Hatfield Report. Spirent requests that the Commission take into consideration the views expressed above.

Respectfully submitted,

Spirent Communications, Inc.

By: /s/

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November 15, 2002